

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BRANDON ALVES, et. al.)) CIVIL ACTION NO.
))
Plaintiffs,))
-against-))
DONNA M. McNAMARA, et. al.,)) DECLARATION OF GENE
)) HULL IN SUPPORT OF
)) MOTION FOR INJUNCTIVE
Defendants.)) RELIEF
))

I, Gene Hull, hereby declare and state the following:

1. I reside in Cambridge, Middlesex County, Massachusetts.
2. I am currently a member of the Second Amendment Foundation.
3. I do not hold a firearms license issued in the Commonwealth of Massachusetts and I do not possess or have access to any firearms, rifles, shotguns or ammunition.
4. I am not prohibited from possessing firearms under Massachusetts or Federal law.
5. I wish to obtain a license to carry (“LTC”) in order to obtain a firearm and ammunition to protect myself and my family should the need arise.
6. I contacted the Cambridge Police Department via email on August 25, 2020 and requested information about submitting my application for an LTC. I received a response to my email later that day from Lieutenant Antonio Ayala stating that “(d)ue to the COVID 19 declared emergency, we are not currently processing new applications for LTC.” (sic). A copy of this email is attached as Exhibit A.
7. I contacted the Lt. Ayala again via email on September 18, 2020 requesting information as to when LTC applications will be accepted again. A copy of this email is attached as Exhibit B.
8. I did not receive a response to my September 18, 2020 inquiry.
9. On January 29, 2021, I called the Cambridge Police Department and spoke with Lt. Ayala. He stated that the Cambridge Police Department had processed some LTC applications at the end of 2020, but that the City has reinstated its ban on in-person activities so they would not be processing any more LTC applications at the time.
10. I was able to email my application to the Cambridge Police Department after my phone conversation with Lt. Ayala.

11. Earlier this month, the Cambridge Police Department contacted me and scheduled an appointment for me to have my fingerprints taken on February 11, 2021. On that date, I came to the police department and was fingerprinted.
12. At the time I provided my fingerprints, the officer I met with told me that it would take two to three months for the police department to finish processing my license application.
13. I visited the website of the Cambridge Police Department today, on March 1, 2021, and saw that there was a notice posted stating: "No fingerprint services are available at this time. Requests for general assistance, applications and License to Carry (LTC) renewals can be made by email: RecordsE-Mail@cambridgepolice.org." A copy of this notice is attached as Exhibit C.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed this 1st day of March, 2021.



Gene Hull